

**Exhibit A**

**Proposed Order**

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et*  
*al.*,

Debtors.<sup>1</sup>

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**This filing relates to the  
Commonwealth and HTA.**

ORDER GRANTING THREE HUNDRED THIRTIETH OMNIBUS OBJECTION  
(NON-SUBSTANTIVE) OF THE COMMONWEALTH OF PUERTO RICO AND THE  
PUERTO RICO HIGHWAYS AND TRANSPORTATION AUTHORITY TO  
SUBSEQUENTLY AMENDED CLAIMS

Upon the *Three Hundred Thirtieth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico and the Puerto Rico Highways and Transportation Authority to Subsequently Amended Claims* [ECF No. 16658] (the “Three Hundred Thirtieth Omnibus Objection”),<sup>2</sup> filed by the Commonwealth of Puerto Rico (“Commonwealth”) and the Puerto Rico

<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”, and together with the Commonwealth, COFINA, HTA, ERS, and PREPA, the “Debtors”) (Bankruptcy Case No. 19-BK-5532-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

<sup>2</sup> Capitalized terms not otherwise defined herein shall have the meanings given to such terms in the Three Hundred Thirtieth Omnibus Objection.

Highways and Transportation Authority (“HTA,” and together with the Commonwealth, the “Debtors”), dated April 30, 2021, for entry of an order disallowing in their entirety certain claims filed against the Commonwealth or HTA, as more fully set forth in the Three Hundred Thirtieth Omnibus Objection and supporting exhibits thereto; and the Court having jurisdiction to consider the Three Hundred Thirtieth Omnibus Objection and to grant the relief requested therein pursuant to PROMESA section 306(a); and venue being proper pursuant to PROMESA section 307(a); and due and proper notice of the Three Hundred Thirtieth Omnibus Objection having been provided to those parties identified therein, and no other or further notice being required; and each of the claims identified in the column titled “Claims to be Disallowed” in Exhibit A to the Three Hundred Thirtieth Omnibus Objection (collectively, the “Claims to Be Disallowed”) having been amended and superseded by the subsequently filed proofs of claim identified in the column titled “Remaining Claims” in Exhibit A (collectively, the “Remaining Claims”); and the Court having determined that the relief sought in the Three Hundred Thirtieth Omnibus Objection is in the best interests of the Commonwealth, HTA, their creditors, and all parties in interest; and the Court having determined that the legal and factual bases set forth in the Three Hundred Thirtieth Omnibus Objection establish just cause for the relief granted herein; and the Court having deemed a hearing is not necessary as no objection, responsive pleading, or request for a hearing with respect to the Three Hundred Thirtieth Omnibus Objection has been submitted, and after due deliberation and sufficient cause appearing therefor, it is hereby

ORDERED that the Three Hundred Thirtieth Omnibus Objection is GRANTED as set forth herein; and it is further

ORDERED that the Claims to Be Disallowed are hereby disallowed in their entirety; and it is further

ORDERED that the Debtors' right to object to the Remaining Claims on any grounds whatsoever is reserved; and it is further

ORDERED that Prime Clerk, LLC, is authorized and directed to designate as expunged the Claims to Be Disallowed on the official claims registry in the Title III Cases; and it is further

ORDERED that this Order resolves Docket Entry No. 16658 in Case No. 17-3283; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

SO ORDERED.

Dated: \_\_\_\_\_

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Honorable Judge Laura Taylor Swain  
United States District Judge

**EXHIBIT A**

**Schedule of Claims Subject to Three Hundred Thirtieth Omnibus Objection**

Three Hundred and Thirtieth Omnibus Objection  
Exhibit A - Claims to Be Disallowed

CLAIMS TO BE DISALLOWED

REMAINING CLAIMS

	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT		NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT
1	FRANCISCO BELTRÁN- CINTRÓN ET AL (4,593 PLAINTIFFS) COLLECTIVELY (THE "BELTRÁN-CINTRÓN PLAINTIFF GROUP"), CIVIL CASE NUM. KAC 2009-0805 / TSPR AC 2016 -0120 LCDA. IVONNE GONZÁLEZ-MORALES P.O. BOX 9021828 SAN JUAN, PR 00902-1828	06/04/18	Commonwealth of Puerto Rico 17 BK 03283-LTS	32789	\$ 85,000,000.00*		FRANCISCO BELTRAN ET ALL (4,493 PLAINTIFFS) COLLECTIVELY (THE BELTRAN CINTRON PLAINTIFF GROUP")... ATTN: IVONNE GONZALEZ-MORALES PO BOX 9021828 SAN JUAN, PR 00902	03/05/21	Commonwealth of Puerto Rico 17 BK 03283-LTS	179140	\$ 105,000,000.00*
Reason: Amended and superseded by a later filed Proof of Claim.											
2	JORGE ABRAHAM GIMENEZ ET AL (1046 PLAINTIFFS) ABRAHAM GIMENEZ PLAINTIFF GROUP YVONNE GONZALEZ MORALES PO BOX 9021828 SAN JUAN, PR 00902-1828	05/25/18	Commonwealth of Puerto Rico 17 BK 03283-LTS	22818	\$ 35,000,000.00*		JORGE ABRAHAM GIMENEZ ET AL (1,046 PLAINTIFFS) COLLECTIVELY (THE "ABRAHAM GIMENEZ PLAINTIFF GROUP") ATTN: IVONNE GONZALEZ-MORALES PO BOX 9021828 SAN JUAN, PR 00902	03/05/21	Commonwealth of Puerto Rico 17 BK 03283-LTS	179141	\$ 35,000,000.00*
Reason: Amended and superseded by a later filed Proof of Claim.											
3	OLMEDA UBILES, REYNALDO HC-15 BOX 15189 HUMACAO, PR 00791	11/16/20	Commonwealth of Puerto Rico 17 BK 03283-LTS	178802	Undetermined*		OLMEDA UBILES, REYNALDO HC-15 BOX 15189 HUMACAO, PR 00791- 9477	12/04/20	Commonwealth of Puerto Rico 17 BK 03283-LTS	178921	\$ 40,000.00
Reason: Amended and superseded by a later filed Proof of Claim.											
4	RIVERA GALARZA, CARMEN IRIS P.O. BOX 512 YABUCOA, PR 00767	08/31/20	Commonwealth of Puerto Rico 17 BK 03283-LTS	174883	Undetermined*		RIVERA GALARZA, CARMEN I. PO BOX 512 YABUCOA, PR 00767	01/11/21	Commonwealth of Puerto Rico 17 BK 03283-LTS	179016	Undetermined*
Reason: Amended and superseded by a later filed Proof of Claim.											

Three Hundred and Thirtieth Omnibus Objection  
Exhibit A - Claims to Be Disallowed

CLAIMS TO BE DISALLOWED

REMAINING CLAIMS

	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT
5	VIELLA GARCIA, FIORINA MARIA, ET AL C/O JOSE F. CARDONA JIMENEZ, ESO. PO BOX 9023593 SAN JUAN, PR 00902-3593	05/21/18	Puerto Rico Highways and Transportation Authority 17 BK 03567-LTS	17736	\$ 33,081,059.47*	FIORINA MARIA VILELLA GARCIA, ET ALS SEE EXHIBIT 1 C/O JOSE F. CARDONA JIMENEZ, ESQ. PO BOX 9023593 SAN JUAN, PR 00902-3593	09/25/18	Puerto Rico Highways and Transportation Authority 17 BK 03567-LTS	167504	\$ 10,108,544.94

Reason: Amended and superseded by a later filed Proof of Claim.